Ammon E. Bundy P.O. Box 1062 Cedar City, Utah 84720 208-872-4030

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH

Ref: AMMON EDWARD BUNDY Case No.: 24-23530 Chapter 7 William T. Thurman

FILED* US Bankruptcy Court-UT JUL 17 2025 AMI1:30

Adversary Proceeding No.: 24-02130

DECLARATION OF AMMON EDWARD BUNDY IN SUPPORT OF NOTICE REGARDING PLAINTIFFS' WITHDRAWAL OF DOCUMENT REQUEST

- I, Ammon Edward Bundy, declare under penalty of perjury as follows:
 - 1. I am named in the above-captioned bankruptcy proceeding and the Defendant in the related adversary case brought by the St. Luke's Plaintiffs.
 - On July 7, 2025, the Court issued an Order [Dkt. 451] requiring me to produce documents responsive to a Rule 2004 subpoena served by St. Luke's. The Court further authorized me to submit an application for reimbursement of the reasonable costs associated with locating and retrieving those documents from storage.
 - 3. In good faith, and in compliance with the Court's order, I submitted an Application for Costs and Expenses on July 8, 2025, totaling \$2,189. This amount covered a forklift rental, labor assistance, fuel, trucking costs, and weatherproofing supplies, all necessary to access documents stored in a sealed 53-foot trailer.
 - 4. The next day, on July 9, 2025, I received an email from Erik Stidham, counsel for St. Luke's, stating that his clients "are not willing to pay [me] \$2,000 to get

- documents out of a trailer." He further stated that they are withdrawing their request for the documents entirely and will inform the Court accordingly.
- 5. St. Luke's has spent what must be tens or hundreds of thousands of dollars in legal fees pursuing discovery against me, including repeated motions claiming I was refusing to cooperate or hiding documents. They even sought to have me held in contempt based in part on this alleged noncompliance.
- 6. Yet now, when ordered by the Court to cover a modest and documented expense—just over \$2,000—to retrieve the very documents they insisted were being withheld, they refuse. This confirms that they were never truly interested in the documents at all. Their real objective was to paint me as uncooperative and dishonest before the Court.
- 7. Their conduct shows a deep contempt—not only toward me, but toward the Court's process itself. They demanded production under threat of contempt, obtained an order compelling compliance, and then abandoned their own request when it came time to pay the reasonable cost. This is not the behavior of a party seeking truth—it is the conduct of a litigant using the legal system to harm a political opponent and damage his credibility.
- 8. I stand ready and willing to retrieve and produce the documents if Plaintiffs comply with the Court's order and pay the authorized expenses. But I respectfully ask the Court to acknowledge that I have complied in full and that any suggestion I am withholding documents should no longer be entertained.

Executed this 11th day of July, 2025 in Cedar City, Utah.

Ammon E. Bundy

CERTIFICATE OF SERVICE

I certify that on this day I served a copy of the attached to:

UNITED STATES BANKRUPTCY COURT, DISTRICT OF UTAH

350 S Main St, Salt Lake City, UT 84101		[X]	USPS
Mark C. Rose, Trustee	mrose@mbt-law.com	[X]	Email
Erik Stidham	efstidham@hollandhart.com	[X]	Email

DATED THIS DAY, the 11th of July, 2025.

Ammon Bundy